

AARON D. DUNHAM (WSBA No. 46405)
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Attorneys for Defendants
AMERICAN CREDIT ACCEPTANCE, LLC,
PAR, INC., and JILLIAN RAE LEE-BARKER
dba COEUR D'ALENE VALLEY RECOVERY SERVICES

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF WASHINGTON

SPOKANE DIVISION

HECTOR LOYOLA and LINDA LOYOLA,)	Case No.: 2:19 CV-2
)	
Plaintiffs,)	DECLARATION OF
)	AARON D. DUNHAM
v.)	
)	
AMERICAN CREDIT ACCEPTANCE,)	
LLC, PAR, INC., and JILLIAN RAE LEE-)	
BARKER dba COEUR D'ALENE)	
VALLEY RECOVERY SERVICES,)	
)	
Defendants.)	

The undersigned, **AARON D. DUNHAM**, declares as follows:

1. I am over the age of 18, competent to testify about the matters stated
below, and have personal knowledge of them.

1 2. I am an attorney at Wolff, Hislop & Crockett, PLLC, and counsel of
2
3 record for all the Defendants in this case, including American Credit Acceptance,
4 LLC, PAR, Inc., and Jillian Rae Lee-Barker dba Coeur D'Alene Valley Recovery
5 Services.
6

7 3. On February 5, 2019, the Defendants invoked the arbitration provision
8
9 in paragraph 20 of the Retail Purchase Agreement as to all claims in the
10
11 Complaint. This was done by sending a letter to the Loyolas' counsel.

12 4. After invoking arbitration, I spoke with their counsel over the phone. In
13
14 that call, he acknowledged receiving the letter and said the Loyolas would not
15
16 agree to arbitrate.

17 5. I declare under penalty of perjury that the foregoing is true and correct.

18
19 Executed on February 15, 2019 at Spokane Valley, Washington.

20
21 /s Aaron D. Dunham

22 **AARON D. DUNHAM, WSBA #46405**
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CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice:

FOR PLAINTIFFS

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Signed and dated at Spokane Valley, Washington this 15th day of February, 2019.

WOLFF, HISLOP & CROCKETT, PLLC

By: /s Aaron D. Dunham
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